

# EXHIBIT D

**From:** [Santora, Victoria M \(CIV\)](#)  
**To:** [Courtney Gans](#); [Xiangnong Wang](#); [Jackson Busch](#); [Michael Tremonte](#); [Ramya Krishnan](#); [Scott Wilkens](#); [Talya R Nevins](#); [Alexander A Abdo](#); [Alexandra Conlon](#); [Jameel Jaffer](#); [Noam Biale](#)  
**Cc:** [Safavi, Nancy \(CIV\)](#); [Strokus, Jessica D. \(CIV\)](#); [Kanellis, William G. \(CIV\)](#); [kanellistravel@gmail.com](mailto:kanellistravel@gmail.com); [Hockenberry, Tia \(CIV\)](#)  
**Subject:** RE: Deposition Scheduling  
**Date:** Tuesday, July 8, 2025 5:22:15 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[image004.jpg](#)

---



Thank you, Courtney. We can confirm ASAC Cunningham and ASAC Crogan's depositions as specified below. Please send notices for those depositions ASAP. Given the late time at which we received the below information, and the lack of a notice, we are unable to attend a deposition tomorrow.

---

**From:** Courtney Gans <CGans@shertremonte.com>  
**Sent:** Tuesday, July 08, 2025 5:15 PM  
**To:** Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Xiangnong Wang <george.wang@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Noam Biale <NBiale@shertremonte.com>  
**Cc:** Safavi, Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; [kanellistravel@gmail.com](mailto:kanellistravel@gmail.com); Hockenberry, Tia (CIV) <Tia.Hockenberry@usdoj.gov>  
**Subject:** [EXTERNAL] RE: Deposition Scheduling

Hi all,

Following up on the scheduled depositions:

1. Mr. McCormack's deposition will take place tomorrow, Wednesday July 9 at 1PM at:

Sher Tremonte LLP  
90 Broad Street  
23<sup>rd</sup> Floor  
New York, New York

Can you let me know who from your side will be attending so we can make sure a visitor pass is available?

2. Mr. Cunningham's deposition will take place on Thursday, July 10 at 1pm at:

Zalkind Duncan & Bernstein  
65A Atlantic Ave  
Boston, MA 02110

3. Mr. Crogan's deposition will take place on Monday July 14 at 10 AM remotely. We will send the login details for the deposition when they are available.

Thank you,

Courtney



**Courtney Gans**

Sher Tremonte LLP

90 Broad Street, 23<sup>rd</sup> Floor | New York, NY 10004

tel: 212.540.0675 | fax: 212.202.4156

[cgans@shertremonte.com](mailto:cgans@shertremonte.com)

[www.shertremonte.com](http://www.shertremonte.com)



This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Santora, Victoria M (CIV) <[Victoria.M.Santora@usdoj.gov](mailto:Victoria.M.Santora@usdoj.gov)>

**Sent:** Sunday, July 6, 2025 5:50 PM

**To:** Xiangnong Wang <[george.wang@knightcolumbia.org](mailto:george.wang@knightcolumbia.org)>; Courtney Gans <[CGans@shertremonte.com](mailto:CGans@shertremonte.com)>; Jackson Busch <[jackson.busch@knightcolumbia.org](mailto:jackson.busch@knightcolumbia.org)>; Michael Tremonte <[MTremonte@shertremonte.com](mailto:MTremonte@shertremonte.com)>; Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>; Scott Wilkens <[scott.wilkens@knightcolumbia.org](mailto:scott.wilkens@knightcolumbia.org)>; Talya R Nevins <[talya.nevins@knightcolumbia.org](mailto:talya.nevins@knightcolumbia.org)>; Alexander A Abdo <[alex.abdo@knightcolumbia.org](mailto:alex.abdo@knightcolumbia.org)>; Alexandra Conlon <[Aconlon@shertremonte.com](mailto:Aconlon@shertremonte.com)>; Jameel Jaffer <[jameel.jaffer@knightcolumbia.org](mailto:jameel.jaffer@knightcolumbia.org)>; Noam Biale <[NBiale@shertremonte.com](mailto:NBiale@shertremonte.com)>

**Cc:** Safavi, Nancy (CIV) <[Nancy.Safavi@usdoj.gov](mailto:Nancy.Safavi@usdoj.gov)>; Strokus, Jessica D. (CIV) <[Jessica.D.Strokus@usdoj.gov](mailto:Jessica.D.Strokus@usdoj.gov)>; Kanellis, William G. (CIV) <[William.G.Kanellis@usdoj.gov](mailto:William.G.Kanellis@usdoj.gov)>; [kanellistravel@gmail.com](mailto:kanellistravel@gmail.com); Hockenberry, Tia (CIV) <[Tia.Hockenberry@usdoj.gov](mailto:Tia.Hockenberry@usdoj.gov)>

**Subject:** Deposition Scheduling

Hi everyone,

Below is a list of the agents' availabilities for depositions. As you have already conducted seven depositions in this case, you may only depose three of the agents. Please let us know who you will depose and the locations of the depositions as soon as possible so that we can

finalize our scheduling.

Additionally, is Cinzia Arruzza available for a remote or in-person (Boston) deposition on Friday, July 11?

Thank you!

Victoria

Tuesday, July 8

(A)SAC Heck Deposition – 2 pm – 6 pm (in-person, DC)

Wednesday, July 9

DSAC McCormack Deposition – 1 pm – 5 pm (in person, NYC)

Thursday, July 10

ASAC Cunningham Deposition – 1 pm – 5 pm (in person, Boston)

Monday, July 14

ASAC Crogan Deposition – Morning ET (virtual, London)

**Victoria M. Santora** | Trial Attorney

United States Department of Justice, Civil Division

Office of Immigration Litigation

P.O. Box 868 | Ben Franklin Station | Washington, DC 20044

Tel.: (202) 616-5573